1 The Honorable Thomas S. Zilly 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 10 UNITED STATES OF AMERICA, NO. CR95-578 TSZ 11 Plaintiff 12 GOVERNMENT'S MOTION TO v. 13 **DISMISS INDICTMENT GREGORIO ILAG** 14 a/k/a George Mendoza NOTED: January 21, 2022 15 Defendant. 16 17 The United States of America, by and through Nicholas W. Brown, United States 18 Attorney for the Western District of Washington, and Andrew C. Friedman, Assistant 19 United States Attorney, submits this motion to dismiss the Indictment against Defendant 20 Gregoria Ilag in the above-entitled case pursuant to Rule 48 of the Federal Rules of 21 Criminal Procedure. 22 Ilag pled guilty in this case in 1999, but fled abroad before sentencing, and 23 remained a fugitive until his death in 2015. The government has confirmed Ilag's death 24 through interviews of family members and by obtaining a copy of his death certificate 25 from the Philippine Bureau of Statistics. As a result, the government requests leave to 26 27 28

dismiss the case, pursuant to Rule 48, which provides that the "government may, with 2 leave of court, dismiss an indictment." 3 DATED: this 11th day of January, 2022. 4 5 Respectfully submitted, 6 NICHOLAS W. BROWN 7 **United States Attorney** 8 9 s/ Andrew C. Friedman ANDREW C. FRIEDMAN 10 Assistant United States Attorney United States Attorney's Office 11 700 Stewart Street, Suite 5220 12 Seattle, Washington 98101 Phone: (206) 553-2277 13 Fax: (206) 553-0755 14 E-mail: andrewcfriedman@usdoj.gov 15 16 17 18 19 20 21 22 23 24 25 26 27 28